

VI. CONCLUSION

For the above reasons, the Commission should immediately conclude this proceeding through an Order which incorporates into its rules the interconnection and mutual compensation provisions of the 1996 Act. The new rules should incorporate LECs' statutory duty to negotiate with CMRS carriers immediately and in good faith, as well as CMRS providers' rights to obtain non-discriminatory, cost-based rates on a reciprocal, symmetrical basis. The Order should also preempt the states from imposing rate and entry requirements on CMRS carriers as a prerequisite to their ability to secure non-discriminatory interconnection agreements.

Respectfully submitted,

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EXHIBIT A

BELL ATLANTIC NYNEX MOBILE (BANM) LEC INTERCONNECTION USAGE RATE COMPARISON

- With one exception, BANM receives no mutual compensation from LECs.
- LEC charges to CLECs are considerably less than those to CMRS carriers.

AREA	Mobile to Land ¹ Avg. Rate per minute	Land to Mobile ^{1,2} Avg. Rate per minute	CLEC to LEC ^{3,4} Avg. Rate per minute	LEC to CLEC ^{3,4} Avg. Rate per minute
Arizona	2.55¢	0¢		
Connecticut	4.14¢	1.73¢	0.80¢	(0.80¢)
D.C.	1.50¢	0¢		
Delaware	1.50¢	0¢		
Maine	5.00¢	0¢		
Massachusetts	3.75¢	0.84¢		
Maryland	2.27¢	0¢	0.50¢	(0.30¢)
N. Carolina	2.80¢	0¢		
N. Hampshire	4.00¢	0¢		
New Jersey	2.01¢	0¢		
New Mexico	2.55¢	0¢		
New York	2.59¢	(2.59¢)	0.98¢	(0.98¢)
Pennsylvania	2.32¢	0¢		
Rhode Island	3.75¢	0¢		
S. Carolina	3.00¢	0¢		
Texas	1.70¢	0¢	0¢	0¢
Virginia	2.43¢	0¢		
Vermont	6.41¢	0¢		
West Virginia	2.72¢	0¢		

Notes:

1. "Mobile to Land" Avg. Rates and "Land to Mobile" Avg. Rates represent the average LEC per-minute-of-use charge paid by Bell Atlantic NYNEX Mobile for interconnection to complete intraLATA calls including local exchange calls. The usage charges are based on Type 2A interconnection usage charges that generally consist of local switching and local transport usage charges. Local transport usage charges generally include a distance-sensitive component. The distance-sensitive component assumes typical distances for Bell Atlantic NYNEX Mobile. In some states, the LEC also charges Bell Atlantic NYNEX Mobile a carrier common line charge.
2. On "Land to Mobile" calls in Connecticut and Massachusetts, Bell Atlantic NYNEX Mobile pays the LEC "Land to Mobile" charges for all intraLATA calls it receives that were originated on the LEC network. In New York, the LEC pays Bell Atlantic NYNEX Mobile reciprocal compensation for these calls.
3. The "CLEC to LEC" Avg. Rates and "LEC to CLEC" Avg. Rates generally apply to local exchange calls between competitive local exchange carriers (CLECs) and LEC networks. They were based on the following:
 - a. Connecticut - Docket No. 94-10-02; DPUC Investigation into the unbundling of the Southern New England Telephone (SNET) Company's Local Telecommunications Network (Dec. 20, 1995). The CLEC to LEC rate shown, SNET's local usage charge, was filed and effective Jan. 3, 1996 as required by the above order. The LEC to CLEC rate shown assumes reciprocal compensation to the CLEC through private agreements. Although CLEC/LEC interconnection in Connecticut is a "bill and keep" arrangement, SNET charges CLECs for use of various unbundled elements pursuant to interim rates effective January 3, 1996. The rate shown is the local port minute of use charge which applies to all calls completed within SNET's local and expanded local calling area.
 - b. Maryland - PSC Order No. 72348 in Case No. 8584 Phase II, dated Dec. 28, 1995 adopted a rate of 0.5 cents/MOU for interconnection at Bell Atlantic - Maryland (BA-MD) tandems and 0.3 cents/MOU for interconnection at its end offices. BA-MD shall pay new local service entrants the same 0.3 cents/MOU rate for termination of calls on their networks.
 - c. New York - New York Telephone Company's PSC No. 914 Tariff effective October 20, 1995; The figure shown represents the "day" usage rate for Meet Point B arrangements which include a tandem switching function and an end office switching function which are the same functions used for cellular Type 2A interconnection. Evening and night rates and rates for interconnection at the end office are up to 70% lower than the day rate listed.
 - d. Texas - Proposed rule 23.97 (to become final on March 27, 1996) provides a 9 month period in which each CTU (certified telecommunications utility) shall reciprocally terminate the other CTU's traffic at no charge. Cellular traffic was explicitly excluded from these interconnection arrangements.
4. Blank spaces in CLEC/LEC Rates indicate that rates have not been determined.
5. "()" indicates compensation paid by LEC to Bell Atlantic NYNEX Mobile or CLECs.